

I.

LEGAL AUTHORITY AND EXECUTIVE SUMMARY

A. INTRODUCTION

Architectural coatings are coatings applied to stationary structures and their appurtenances, and include such coatings as house paints, stains, industrial maintenance coatings, and traffic coatings.¹ The use of architectural coatings in California results in substantial emissions of volatile organic compounds (VOCs), which contribute to the formation of ozone and particulate matter (PM). These two pollutants pose the California's most serious air quality problems.

Control of emissions from architectural coatings is primarily the role of the local air pollution control districts and air quality management districts (districts). Widespread regulation of architectural coatings began in 1977, when the Air Resources Board (ARB) adopted a Suggested Control Measure (SCM) for architectural coatings. Many districts adopted architectural coatings rules based on this SCM and on revisions to the SCM in 1985 and 1989. Currently, 17 of California's 35 districts have adopted architectural coatings rules. Given the advances in coatings technologies over the past 10 years, and given the need for further emission reductions to attain health-based air quality standards in many districts, the ARB, in cooperation with the districts, has reviewed the VOC content limits in the 1989 SCM and current district rules. The outcome of this review was the proposal of a new SCM.

In accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code §§21000 *et seq.*), the ARB is the lead agency and has prepared a Draft Program Environmental Impact Report (EIR) for the architectural coatings SCM. The EIR includes an analysis of environmental impacts that could potentially result from implementation of architectural coatings rules based on the SCM throughout California.

A Notice of Preparation and Initial Study (NOP/IS) for this Draft Program EIR (included herein as Appendix B) was distributed to responsible agencies and interested parties for a 30-day review and comment period ending July 22, 1999. The NOP/IS identified potential adverse impacts for the following environmental topics: air quality, water, public services, transportation/circulation, solid waste/hazardous waste, and hazards. The ARB received 23 comment letters during the public comment period. Additionally, ARB received one comment letter on the NOP/IS outside the 30-day comment period. CEQA related comments were also received during a public workshop/CEQA Scoping Meeting held on July 1, 1999. ARB staff's responses to the CEQA related comments submitted on the NOP/IS, as well as comments provided at the CEQA Scoping Meeting, are presented in Appendix C of this Draft Program EIR.

¹ An exact definition of "architectural coatings" can be found in the text of the Suggested Control Measure (Appendix A of this Draft Program EIR).

B. LEGAL AUTHORITY

California law establishes a comprehensive air pollution control program, which is set forth in Division 26 of the Health and Safety Code. Under this program, the responsibility for controlling air pollution in California is shared by the ARB and the local districts. The districts have the primary legal responsibility, subject to ARB oversight, to adopt control measures for nonvehicular sources of air pollution, including architectural coatings (Health and Safety Code §§39002, 40000, 40001, and 40702).

The ARB has the responsibility to adopt control measures for vehicular sources of air pollution (Health and Safety Code §§39002 and 40000), and has also been assigned numerous other duties by the California Legislature. Among these duties, the ARB is charged with coordinating efforts to attain and maintain ambient air quality standards, and to conduct research into the causes of and solution to air pollution (Health and Safety Code §39003); to provide technical assistance to the districts when appropriate (Health and Safety Code §§39605 and 40916); to coordinate, encourage, and review the districts' efforts to attain and maintain air quality standards (Health and Safety Code §§39500 and 41500); and to do such acts as may be necessary for the proper execution of the powers and duties to, and imposed upon, the ARB by Division 26 of the Health and Safety Code and any other provision of law (Health and Safety Code §39600). To fulfill these statutory mandates, the ARB often provides guidance and other assistance to the districts, including the development of model rules, such as the Suggested Control Measure for Architectural Coatings.

C. PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Both CEQA and ARB policy require the ARB to evaluate the potential adverse environmental impacts of proposed projects. CEQA also requires that methods to reduce or avoid identified significant adverse environmental impacts of a project be implemented if feasible. The purpose of the Draft Program EIR is to inform public agencies and interested parties of potentially significant adverse environmental impacts associated with the implementation of the proposed project.

California Public Resources Code §21080.5 allows public agencies with regulatory programs to prepare a plan or other written document in lieu of an environmental impact report, once the Secretary of the Resources Agency has certified the regulatory program. The Secretary of the Resources Agency has certified the portion of the ARB's regulatory program "... which involves the adoption, approval, amendment, or repeal of standards, rules, regulations, or plans to be used in the regulatory program for the protection and enhancement of ambient air quality in California" (see title 14, California Code of Regulations (CCR), §15251(d)). The adoption of the SCM is within the scope of this certification, which would allow the ARB to include the environmental analysis for the SCM in an ARB staff report instead of preparing a formal environmental impact report or negative declaration (see title 17, CCR, §§60005 to 60007).

Instead of placing the environmental analysis in an ARB staff report, however, the ARB believes that a Program EIR format would be more useful to districts that choose to adopt the

SCM. When a district decides to adopt the SCM as a local district rule, the district will need to determine how to comply with CEQA. One possibility would be for each district to prepare its own new project EIR for the district version of the SCM. But a new project EIR prepared by each district would require a large expenditure of resources, and would likely substantially duplicate the ARB's environmental impact analysis for what is essentially the same project. To avoid such duplication, the CEQA Guidelines (see title 14, CCR, §15168) allow a lead agency to prepare a Program EIR for a series of actions that can be characterized as one large project and are related either: (1) geographically, (2) as logical parts in a chain of contemplated actions, or (3) in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program.

For projects such as the ARB's SCM, which is specifically designed to be subsequently adopted by the districts as local district rules, an environmental analysis in the form of a Program EIR provides the CEQA framework that can be relied upon by the districts when adopting ARB's SCM. Under the general principles of CEQA, the districts may use a similar environmental assessment prepared under the ARB's certified regulatory program in the same way that a Program EIR could be used. However, the precedent of using a Program EIR for this purpose is more clearly established in the CEQA Guidelines and case law, and the Program EIR format may be more familiar to the districts and the regulated community. For this particular SCM, it is important that the districts be provided with an environmental analysis format that will be consistent with, and more easily incorporated into, their own CEQA compliance process. Using a Program EIR format will accomplish this goal.

In preparing this Draft Program EIR for the ARB's SCM, the ARB has followed the procedural and substantive requirements for a Program EIR even though the ARB is not legally required to use this particular format. This Draft Program EIR has specifically and comprehensively addressed the environmental impacts associated with the Architectural Coatings SCM in accordance with CEQA, so that the districts, if they choose to do so, may rely on the analysis in the Program EIR when adopting or amending their architectural coatings rules.

The ARB intends that each district may rely on the Program EIR by incorporating it by reference in whatever CEQA documents a district chooses to prepare for its own architectural coatings rule. For example, a district could use the ARB's SCM Program EIR to provide the basis for an initial study for determining whether the district's version of the SCM may have any significant effects (see title 14, CCR §15168(d)). The district might then decide to prepare a negative declaration (if the district believes that the Program EIR appropriately analyzes the environmental impacts of adopting the SCM in that district), or a focused EIR (if, for example, the district believes that additional analysis may be necessary beyond the analysis contained in the Program EIR, in order to address factors that are specific to the individual district and may not have been fully considered in the Program EIR). These examples are not intended to dictate how a district may use the ARB's SCM Program EIR. It will be up to each district to decide on the best way to comply with CEQA in their particular circumstances. The ARB's SCM Program EIR will simply be available for whatever use the district feels is appropriate.

D. EXECUTIVE SUMMARY

The organization of this Draft Program EIR is as follows: Chapter I – Legal Authority and Executive Summary; Chapter II – Project Description; Chapter III – Existing Setting; Chapter IV – Environmental Impacts and Mitigation Measures; and Chapter V – Project Alternatives. The following subsections briefly summarize the contents of each chapter.

1. Summary of Chapter I – Legal Authority and Executive Summary

This chapter contains a discussion of the legal authority of the ARB to adopt SCMs as guidance to local districts. It also provides the basis for preparing a Draft Program EIR. This chapter also provides a summary of the contents of each chapter.

2. Summary of Chapter II – Project Description

In addition to including a description of the project location, Chapter II also includes a brief description of the SCM. Briefly, the primary objective of the proposed SCM is to provide a model rule for use by the local air districts, and to set VOC limits and other requirements that are feasible (based on existing and currently developing coatings technology) and that will achieve significant reductions in VOC emissions from architectural coatings. The SCM is also intended to improve the clarity and enforceability of existing district architectural coatings rules and provide a basis for uniformity among architectural coatings rules in California. The proposed project is essentially a model rule (*i.e.*, a SCM) that is designed to reduce VOC emissions from architectural coatings. The proposed SCM sets allowable VOC content limits for a number of architectural coatings categories, including categories such as flats, nonflats, industrial maintenance, lacquers, floor, roof, rust preventative, stains, and primers, sealers, and undercoaters. The proposed VOC limits would become effective on January 1, 2003 (January 1, 2004, for industrial maintenance coatings).

For a complete description of the SCM, the reader is referred to Appendix A.

3. Summary of Chapter III – Existing Setting

Chapter III includes descriptions of those environmental areas that might possibly be adversely affected by implementing architectural coatings rules based on the SCM. The following subsections briefly describe the existing settings for these environmental areas.

a. Air Quality

Over the last decade and a half, California's air quality has improved significantly. Nevertheless, a majority of the air basins in California still exceed the State and federal air quality standards for two pollutants of concern—ozone and particulate matter. To protect California's population from the harmful effects of both of these pollutants, federal and State air quality standards have been set for ozone and PM₁₀ (particulate matter less than 10 microns equivalent aerodynamic diameter). While no State or federal ambient air quality standards have been set for VOCs because they are not classified as criteria pollutants, VOCs are regulated

because they contribute to the formation of both ozone and PM₁₀. Numerous VOCs have also been identified as toxic air contaminants and are regulated through the ARB's Toxic Air Contaminant Control Program.

The California Clean Air Act requires districts that have been designated nonattainment for the State ambient air quality standard for ozone to prepare and submit plans for attaining and maintaining the standard. In addition, the federal Clean Air Act requires districts designated nonattainment for the federal ambient air quality standards to prepare air quality management plans to demonstrate attainment with the federal standards. In some districts, substantial additional emission reductions will be necessary if attainment is to be achieved.

This section in Chapter III also provides a summary of the health effects of ozone and PM₁₀, as well as a discussion of regional air quality and climate.

b. Water

The Department of Water Resources estimates that California's total water demand, based on the planning year 1995, is approximately 80 million acre feet (maf)² (about 25 trillion gallons) in average years and 65 maf (about 21 trillion gallons) in drought years. California's water demand in 2020 is forecasted to reach 81 maf (about 26 trillion gallons) in average years and 66 maf (about 22 trillion gallons) in drought years. The gap between water supply and water demand is projected to total 2.4 maf statewide during normal years and up to 6.2 maf in drought years by 2020. Water management options that are likely to be implemented would reduce these shortages to 0.2 maf in normal years and 2.7 maf in drought years. Not all areas of California are expected to experience shortages.

The State Water Resources Control Board (SWRCB) and the nine regional water quality control boards (RWQCBs) are responsible for protecting surface and groundwater supplies in California, regulating waste disposal, and requiring cleanup of hazardous conditions (California Water Code §§13000-13999.16). In particular, the SWRCB establishes water-related policies and approves water quality control plans, which are implemented and enforced by the RWQCBs. These agencies also regulate discharges to state waters through federal National Pollution Discharge Elimination System (NPDES) permits. Discharges to publicly owned treatment works (POTWs) are regulated through federal pre-treatment requirements enforced by the POTWs. There are 630 POTWs within California with a total permitted capacity of approximately 3.7 billion gallons per day.

c. Public Services

Public services offered throughout California include fire protection, police protection, schools, parks, and other public facilities.

City and county fire departments generally provide fire protection services with some cities contracting with the counties for services. The U.S. Forest Service provides fire protection

² One acre foot (AF) is equivalent to 325,800 gallons.

on all national forest lands while the California Department of Forestry has jurisdiction over wildland fire protection in various unincorporated areas of California. County departments of forestry serve some areas. Over 60,000 personnel are employed in fire protection throughout California.

d. Transportation/Circulation

The agencies that share authority for transportation related programs in California include Caltrans, regional transportation planning agencies (RTPAs), and local governments. RTPAs develop long-range regional transportation plans (RTPs) and Transportation Improvement Programs (TIPs), which detail all of the capital and noncapital improvements to the transportation system that are planned and for which funds have been identified. RTPs also include descriptions of the various transportation and transit systems.

The federal Clean Air Act requires both RTPs and TIPs to ensure that on-road motor vehicle emissions are within State Implementation Plan limits. The California Clean Air Act requires urbanized areas in nonattainment districts to reduce the rate of travel growth.

e. Solid Waste/Hazardous Waste

Solid wastes consist of residential wastes (trash and garbage produced by households), construction wastes, commercial and industrial wastes, home appliances and abandoned vehicles, and sludge residues (waste remaining at the end of the sewage treatment process). A total of 188 Class III (non-hazardous) active landfills are located throughout California with a total permitted disposal capacity of 220,565 tons per day. Solidified paints may also be disposed of in such landfills.

Hazardous materials are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. A hazardous waste is any hazardous material that is discarded, abandoned, or to be recycled. In California, leftover liquid latex or oil-based paint is considered a hazardous waste and must be managed appropriately. Currently, there are three Class I landfills located in California, with estimated remaining disposal capacities of five, seven, and 20 years. Hazardous waste can also be shipped out of California for treatment and disposal.

f. Hazards

Potential hazards impacts may be associated with the production, use, storage, and transport of hazardous materials. Hazardous materials may be found at industrial production and processing facilities. Examples of hazardous materials used by consumers include petroleum, solvents, and coatings. Currently, hazardous materials are transported throughout California in great quantities via all modes of transportation including rail, highway, water, air and pipeline.

Hazards concerns are related to the risks of explosions, the release of hazardous substances, or exposure to air toxics. State law requires detailed planning to ensure that

hazardous materials are properly handled, used, stored, and disposed of to prevent or mitigate injury to health or the environment in the event that such materials are accidentally released. Federal laws, such as the Emergency Planning and Community-Right-to-Know Act of 1986 (also known as Title III of the Superfund Amendments and Reauthorization Act or SARA) impose similar requirements.

This section in Chapter III also describes the reporting system for reporting accidental releases of hazardous materials. Data are provided for the number of hazardous materials releases in 1998, statewide. In addition, data are provided for releases of materials used to formulate architectural coatings.

Chapter III also briefly describes the existing setting for human health as it is affected by emissions from existing coatings formulations. As noted in this section, the actual effects of exposure to coatings depend on such factors as the exposure duration, potency of the solvents of concern, exposure frequency, and other factors. A table is included that shows the solvents currently used to formulate architectural coatings that are considered to be toxic substances. The table also shows the range of adverse human health effects for each toxic substance.

4. Summary of Chapter IV - Environmental Impacts and Mitigation Measures

CEQA Guidelines §15126(a) require the following: “An EIR shall identify and focus on the significant environmental effects of the proposed project. Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects.”

The following subsections briefly summarize the analysis of environmental impacts that were identified in the NOP/IS as potentially resulting from implementation of the SCM.

a. Air Quality

Air quality impacts are considered significant if the proposal would conflict with or obstruct implementation of the applicable air quality plan; violate any air quality standard or contribute to an existing or projected air quality violation; expose sensitive receptors to substantial pollutant concentrations; expose off-site receptors to significant concentrations of hazardous air pollutants; result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment; diminish an existing air quality rule or future compliance requirement resulting in a significant increase in air pollutants; or create objectionable odors affecting a substantial number of people.

The adoption and implementation of the SCM on a statewide basis is expected to produce substantial, long-term, VOC emission reductions. The analysis concludes that no significant adverse air quality impacts will result from the proposed SCM. Implementation of the proposed VOC content limits in the SCM will result in VOC emission reductions of approximately 11 tons per day statewide (excluding the South Coast) beginning in 2003, a net air quality benefit.

Some companies in the architectural coatings industry have claimed that lowering the VOC content of coatings results in increased VOC emissions for a variety of reasons: increased coating thickness, more thinning, more topcoats, more touch-ups, more priming, more frequent recoating, more substituted coatings, and greater reactivity. Basically, these companies claim that new formulations result in more coating use, resulting in an overall increase in VOC emissions for a specific area covered, or over time. Industry also asserts that more reactive solvents will be used in compliant reformulations than those used in existing coatings, thus contributing to increased ozone formation. All eight areas were analyzed in depth in Chapter IV. The analysis reveals that overall, the SCM will achieve significant VOC emission reductions and the claimed adverse impacts will not occur.

Another claim made by some companies is that increased application of acetone-based coatings has the potential to increase objectionable odors. However, acetone used as a replacement for other traditional solvents may have fewer odor impacts because it has a higher odor threshold than many other solvents currently used in coatings. Given that the SCM allows sufficient time for manufacturers to develop compliant coatings and solve any odor problems associated with reformulated coatings, no significant adverse odor impacts are expected from lowering the VOC content limits.

No significant impacts are anticipated, therefore, no mitigation measures are necessary. Cumulative impacts are also considered not significant.

b. Water

Impacts on water resources are divided into two categories—water demand and water quality. Water impacts are considered significant if they cause changes in the course of water movements or of drainage or surface runoff patterns that would result in erosion or flooding; exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; substantially degrade water quality; deplete groundwater supplies, or interfere with groundwater recharge efforts; violate any water quality standards or waste discharge requirements, or exceed wastewater treatment requirements of the applicable RWQCB; require the construction of new, or expansion of existing, water, wastewater, or stormwater drainage facilities, the construction of which could cause significant environmental effects; require new or expanded water entitlements and resources; or exceed a wastewater treatment provider's existing commitments.

i. Water Demand

Increased water demand from the manufacturing and use of compliant water-borne coatings is evaluated in Chapter IV. The analysis concludes that water demand impacts associated with the SCM will be insignificant. The analysis reveals that while there is insufficient capacity in some hydrologic regions of California to meet current and projected water demand, the increased water demand associated with implementation of the SCM is *de minimis*. Furthermore, the various water providers throughout California are currently exploring various strategies for increasing water supplies and maximizing the use of existing supplies.

Options include storage of water from existing sources, use or storage of water unused by other states or agricultural agencies, and advance delivery of water to irrigation districts.

No significant impacts are anticipated, therefore, no mitigation measures are necessary. Cumulative impacts are also considered not significant.

ii. Water Quality

The SCM is also not expected to adversely impact water quality. First, use of exempt solvents (solvents not considered to be VOCs) is expected to result in equivalent or fewer water quality impacts than currently used solvents since the exempt solvents are less toxic. Second, because currently available compliant coatings are already based on water-borne technology, no additional water quality impacts from future compliant water-borne coatings are expected because these coatings are also expected to be water based. The current manufacturing and cleanup practices associated with water-borne coatings are not expected to change as a result of the SCM. Lastly, the SCM is not expected to promote the use of compliant coatings formulated with hazardous solvents that could create water quality impacts.

No significant impacts are anticipated, therefore, no mitigation measures are necessary. Cumulative impacts are also considered not significant.

c. Public Services

Public services impacts are considered significant if they will result in adverse physical impacts associated with the provision of new or altered public facilities in order to maintain acceptable service ratios or response times for fire protection, police protection, schools, parks, or other public facilities.

i. Public Facility Maintenance

Although not required by CEQA, ARB staff has examined the potential for increased maintenance at public facilities due to implementing the SCM. Infrastructure needs at public facilities are not expected to be impacted due to more frequent touchups to maintain facility appearance, equipment, or safety. Implementation of the SCM is also not expected to result in the need for new or altered public facilities.

ii. Fire Protection

The increased use of exempt solvents or other replacement solvents as a result of implementing the SCM will not result in any significant increased need for fire protection. Although acetone, which is flammable, is expected to be used to reformulate a limited number of coatings (lacquers, floor coatings, and waterproofing sealers), it is unlikely that implementation of the SCM will substantially increase the future use of acetone throughout California. Many conventional solvents are as flammable as acetone, so there would be no net change or possibly a reduction in the hazards consequences from replacing some conventional solvents with acetone. Furthermore, future compliant coatings materials are expected to be less hazardous than some currently used

materials, so accidental releases would be expected to pose a lower risk to responding firefighters.

No significant impacts are anticipated, therefore, no mitigation measures are necessary. Cumulative impacts are also considered not significant.

d. Transportation/Circulation

Transportation/circulation impacts are considered significant if they cause a substantial increase in traffic related to the existing traffic load and street capacity; exceed a level of service standard for designated roads or highways; substantially increase hazards due to a design feature or incompatible uses; result in inadequate emergency access, parking capacity, or hazards or barriers for pedestrians or bicyclists; or conflict with adopted alternative transportation policies, plans, or programs.

The potential additional trips caused by the disposal of coatings due to the possibility of shorter shelf or pot lives or lesser freeze-thaw capabilities, as compared to conventional coatings, are evaluated in Chapter IV. The analysis concludes that transportation/circulation impacts associated with the SCM will be insignificant. Therefore, no mitigation measures are necessary. Cumulative impacts are also considered not significant.

e. Solid Waste/Hazardous Waste

Solid waste/hazardous waste impacts are considered significant if the proposal would not be served by a landfill with sufficient permitted capacity to accommodate the project's solid and/or hazardous waste disposal needs, or would not comply with federal, state, and local statutes and regulations related to solid and hazardous wastes.

The solid waste/hazardous waste analysis examined increased disposal of coatings due to the possibility of shorter shelf or pot lives or lesser freeze-thaw capabilities as compared to conventional coatings. The analysis concluded that solid waste/hazardous waste impacts associated with the SCM will be insignificant. Therefore, no mitigation measures are necessary. Cumulative impacts are also considered not significant.

f. Hazards

Hazards impacts are considered significant if they create a significant hazard to the public or the environment through the transport, use, disposal, or other handling of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials; result in the handling of hazardous materials or wastes within 1/4 mile of an existing or proposed school; are located on a site included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5; impair implementation of an adopted emergency response or evacuation plan; or increase fire hazard in areas with flammable materials.

i. Risk of Upset

Any increase in accidental releases of future compliant coatings materials would be expected to result in a concurrent reduction in the number of accidental releases of existing coatings materials. Further, it is anticipated that resin manufacturers and coatings formulators will continue the trend of using less hazardous solvents such as Texanol, Oxsol 100, and propylene glycol in their compliant, water-borne coatings. It is expected that future compliant coatings will contain less hazardous or nonhazardous materials as compared to conventional coatings, resulting in a net benefit. Therefore, hazards impacts associated with the proposed SCM will be insignificant and no mitigation measures are necessary. Cumulative impacts are also considered not significant.

ii. Human Health

The human health impacts analysis examined the potential increased long-term (carcinogenic and chronic) and short-term (acute) human health impacts associated with the use of various replacement solvents in compliant coatings formulations. The analysis concluded that the general public would not be exposed to long-term health risks due to the application of coatings. Furthermore, long-term exposures of professional coatings applicators to more toxic replacement solvents such as diisocyanates are reduced by following the coatings manufacturers', Occupational Safety and Health Administration's (OSHA), and American Conference of Governmental Industrial Hygienists' (ACGIH) required and recommended safety procedures. Additionally, many resin manufacturers and coatings formulators are replacing more toxic solvents such as monomeric diisocyanates, EGBE, etc., with less toxic solvents such as polymeric diisocyanates, Texanol, and propylene glycol, further reducing the long-term human health risks from the use of compliant coatings.

Staff also evaluated the use of low- or zero-VOC, two-component, industrial maintenance (IM) systems containing diisocyanate compounds. Based on actual field monitoring data, and the chemistry of the two-component systems, staff has determined their use would not expose the public at large to significant acute human health impacts. Test data show that the concentrations of diisocyanate compounds emitted during the application of these IM systems are below established health protective thresholds. For acute exposure to applicators, the use of the same safety procedures to reduce long-term health effects will also reduce short-term health effects associated with the use of replacement solvents. Although toluene diisocyanate (TDI), which is classified as a carcinogen, could be used in low-VOC, two-component IM coatings, adverse impacts are not expected because application of IM coatings occurs primarily in industrial settings where sufficient safety equipment and procedures are in place to prevent significant exposures. Also, the application of these coating systems will be for maintenance (touch-up and repair) or repaint purposes, lasting only a few days to weeks, and occurring on an intermittent basis (once every two years to every 10 years or more). Based on these intermittent exposures, increased cancer risks are negligible. Furthermore, the coatings industry is moving away from using TDI to using noncarcinogens to formulate low-VOC, two-component coatings.

Lastly, staff evaluated the potential for exposure to crystalline silica as a result of increased sandblasting of surfaces prior to application of low-VOC coatings. Implementation of

the SCM is not anticipated to result in the need for increased sandblasting or other surface preparation techniques. Moreover, State law restricts outdoor abrasive blasting throughout California. Under title 17, CCR, abrasive blasting may not be performed outdoors unless specified techniques and/or materials are used. Those techniques and materials minimize the emission of fine particulate matter from blasting operations, and thus minimize public exposure to inhalable particles.

Therefore, the general public as well as coatings applicators will not be exposed to significant long-term or short-term human health risks as a result of implementation of the SCM. Because no adverse impacts were identified, no mitigation measures are necessary. Cumulative impacts are also considered not significant.

g. Mitigation

Table I-1 summarizes the impacts and mitigation measures associated with the environmental impact areas that the ARB analyzed for the SCM.

**TABLE I-1
ENVIRONMENTAL IMPACTS FROM IMPLEMENTATION OF THE SCM**

Environmental Impact Area	Significance Determination	Mitigation Measures
Air Quality	Not Significant	None Required
Water		
Water Demand	Not Significant	None Required
Water Quality	Not Significant	None Required
Public Services		
Public Facility Maintenance	Not Significant	None Required
Fire Protection	Not Significant	None Required
Transportation/Circulation	Not Significant	None Required
Solid Waste/Hazardous Waste	Not Significant	None Required
Hazards		
Risk of Upset	Not Significant	None Required
Human Health	Not Significant	None Required

h. Environmental Impacts Found Not to be Significant

The Initial Study for the SCM includes an environmental checklist of 15 environmental categories. As discussed above, review of the proposed project at the NOP/IS stage identified six areas for further review in the Draft Program EIR. For the remaining nine environmental areas where the Initial Study concluded that the project would have no significant direct or indirect adverse effects, no comments were received on the NOP/IS or at the public meetings that changed this conclusion. Consistent with CEQA, ARB staff has reaffirmed that there will be no

significant impacts to the following environmental resources in California as a result of implementing the SCM:

- Land Use and Planning
- Population and Housing
- Geophysical
- Biological Resources
- Energy and Mineral Resources
- Noise
- Aesthetics
- Cultural Resources
- Recreation

i. Other CEQA Topics

CEQA requires Program EIRs to address the potential for irreversible environmental changes, growth-inducing impacts, and inconsistencies with regional plans. Consistent with CEQA, additional analysis of the proposed project confirms that it would not result in irreversible environmental changes or the irretrievable commitment of resources, foster economic or population growth or the construction of additional housing, or be inconsistent with regional plans.

5. Summary of Chapter V – Project Alternatives

Chapter V provides a discussion of alternatives to the proposed project even though such an analysis is not required since this Draft Program EIR finds no significant impacts. The alternatives analyzed include measures for attaining the objectives of the proposed project and provide a means for evaluating the comparative merits of each alternative.

The NOP/IS prepared for the SCM included seven concepts that could possibly be further developed into project alternatives. These concepts included a low vapor pressure exemption, performance-based standards, reactivity-based standards, product line averaging, regional regulation, seasonal regulation, and modification of the VOC content limits/final compliance deadlines. In addition, ARB staff evaluated exceedance fees in response to a comment received on the NOP/IS. In addition to the alternatives specifically discussed in Chapter V, ARB staff also considered other alternatives during the development of the SCM. These alternatives consist of the many variations in the language of the SCM that were considered during the development of the SCM, as different versions of the SCM were distributed to the public, and modifications to the SCM's language that were made in response to comments received from industry and the air districts. The current version of the proposed SCM incorporates many of these suggested changes.

Alternatives the staff rejected as infeasible include the low vapor pressure exemption, performance-based standards, reactivity-based standards, regional regulation, seasonal

regulation, and exceedance fees. Alternatives the staff considered to be feasible include the No Project Alternative, the Extended Compliance Deadlines Alternative, the Further Reduction of VOC Content Limits Alternative, and the Product Line Averaging Alternative. The rationale for the staff's conclusions is presented in Chapter V.